

Fact Sheet



For Final Minor Modification Permitting Action Under 45CSR30 and Title V of the Clean Air Act

This Fact Sheet serves to address the changes specific to this Minor Modification, and shall be considered a supplement to the original Fact Sheet corresponding with the issuance of the initial Title V operating permit issued on November 17, 2005.

Permit Number: **R30-09700029-2005**

Application Received: **March 16, 2009**

Plant Identification Number: **097-00029**

Permittee: **Weyerhaeuser NR Company**

Facility Name: **Buckhannon Facility**

Mailing Address: **100 TJM Drive, Buckhannon, WV 26201**

Permit Action Number: *MM01*;

Revised: *July 21, 2009*

Physical Location:	Buckhannon, Upshur County, West Virginia
UTM Coordinates:	569.01 km Easting • 4317.79 km Northing • 17 Zone
Directions:	From Charleston, take Interstate 79 North to the Buckhannon Exit (Exit 99), proceed east on State Route 33 to the Morton Avenue exit (County Route 13). Turn left on Morton Avenue and proceed approximately one (1) mile to the facility located on the right.

Facility Description

Weyerhaeuser NR Company (Weyerhaeuser) is an engineered wood products facility covered by Standard Industrial Classification (SIC) Code 2493. The facility has the potential to operate twenty-four (24) hours per day, seven (7) days per week and fifty-two (52) weeks per year. The facility consists of one (1) wood-fired furnace, one (1) propane furnace, two (2) veneer dryers, three (3) wood presses, four (4) storage tanks of various sizes, six (6) baghouse systems, one (1) ESP, and one (1) spray booth.

This Minor Modification incorporates changes to recently updated Permit R13-1843B (increase of production rate) and Company name change from *Trus Joist, A Weyerhaeuser Business* to *Weyerhaeuser NR Company*.

Summary of Emissions changes

As the result of this modification facility-wide PTE is not changed.

Title V Program Applicability Basis

This facility has the potential to emit over 100 tons per year of Nitrogen Oxides (NO_x), Carbon Monoxide (CO) and Volatile Organic Compounds (VOC). Weyerhaeuser has the potential to emit over 100 tons per year of criteria pollutants, over 10 tons per year of a single HAP, and over 25 tons per year of aggregate HAPs. Therefore, Weyerhaeuser is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR7	To Prevent and Control Particulate Air Pollution from Manufacturing Process Operations Permits for Construction, Modification, Relocation and Operation of Stationary Sources of Air Pollutants, Notification Requirements, Temporary Permits, General Permits, and Procedures for Evaluation. Operating permit requirement.
	45CSR13	
	45CSR30	

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR15, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-1843B	March 27, 2009	PD08-066

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The Company requested the following changes to the Permit (besides the name change):

- a) an increase in veneer production rate from 33,000 lbs/hr to 42,000 lbs/hr of dry veneer;
- b) an increase in Veneer Dryers' (003-01) average maximum temperature setpoint from 400°F to 500°F;
- c) a change of Veneer Dryers' maximum average temperature range from 350-450°F to 300-550°F.

Items (a) and (b) are related to both R13-1843B and Title V Permit terms, item (c) is related to Title V Permit only.

These changes will increase actual PM and VOC emissions from the Veneer Dryers. The Company estimated actual emissions increase using AP-42 emission factors (Section 10.9. Engineered Wood Products Manufacturing), and also compared them to results of a compliance demonstration test conducted on August 22, 2005.

1) PM emissions estimate

According to the 2005 test results PM emissions of Veneer Dryers (1.9 lb/hr per cooling stack) were significantly lower than permitted limits set forth in 3.1.22 (7.4 lb/hr per cooling stack). Estimated actual PM emissions at the increased production rate of 42,000 lbs/hr (2.69 lbs/hr) are also below the 3.1.22 limit. Therefore, at the increased production rate compliance with PM emission limit in 3.1.22 will be demonstrated.

45CSR§7-4.1

The allowable particulate matter (PM) stack emission rate for the Veneer Dryers based on the maximum raw material feed rate (these sources are a type 'a' operation):

Stack Emission Sources		Process Weight	Allowable Stack Emission Rate
Source	Stack No.	LB/hr	LB PM/hr
VeneerDryr	2 to 13	70,000	31.8

2) VOC emissions estimate

According to the 2005 test results, VOC emissions of Veneer Dryers were lower than limit in 3.1.22 (see table below). Estimated VOC emissions at the increased production rate (42,000 lb/hr) are also lower than the limit, provided there is no increase in the Dryers' temperature. Although, it is not clear how an increased Dryers' temperature (up to 550°F) would influence VOC emissions.

Production rate, Dry veneer, lb/hr	VOC emissions, lb/hr			Permit limit in 3.1.22, lb/hr
	Test results at ave. T 390°F	Estimated based on the Test results	Estimated based on AP-42 factors	
29,666 (at the test)	5.94	n/a	8.08	18.0
33,000 (in current Permit)	n/a	6.61	8.98	18.0
42,000 (proposed)	n/a	8.41	11.44	18.0

3) Discussion

Title V Permit Condition 3.3.4.b requires VOC emissions tests before establishing new parameters ranges in the Permit in order to assure compliance with VOC limit (in 3.2.2). There are 2 parameters listed - production rate limit (3.3.4.b.i) and maximum average temperature for the Veneer Dryers (3.3.4.b.ii). However, the production rate limit was not intended to be a parameter range for which testing is required in order to be changed. Therefore, it can be revised from 33,000 lbs/hr to 42,000 lbs/hr (as per R13-1843B) without having to perform tests. The maximum average temperature for the Veneer Dryers is indeed a parameter with an established range (350-450°F), therefore, per 3.3.4.b, stack tests need to be performed in order to change the range to 300-550°F. The higher temperature is requested in order to increase production, but at this time the current temperature range will remain intact (350-450°F). Also, for clarification purposes, Requirement 3.3.4.b was revised by adding "(veneer dryers' maximum average temperature)" after the "new parameters" and "parameter."

In addition, Veneer Dryers' maximum temperature setpoint in Requirement 3.1.29 also cannot be changed from 400°F to 500°F (as per R13-1843B) prior to the testing. Therefore, at this time previous 3.1.29 condition will remain intact using the authority in 45CSR§30-12.7 (citation was revised).

4) Conclusion

Based on the said above, the only requested change that can be granted in this Permit modification is the production rate increase (item (a) above). The following Requirements were revised to reflect the change: 3.1.28, 3.3.3.a and 3.3.4.b.i. The Company's intention is to perform VOC tests at the time of the Permit renewal, and revise the Permit thereafter to establish new Veneer Dryers' setpoint temperature and temperature range (items (b) and (c) above).

Also, Veneer Dryers Design Capacity numbers in Emission Units Table 1.0. were changed. In addition, Sections' IDs in Requirement 3.3.3 were corrected.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: Not required for minor modifications
Ending Date:

All written comments should be addressed to the following individual and office:

Natalya Chertkovsky-Veselova
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Natalya Chertkovsky-Veselova
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. (1220) • Fax: 304/926-0478

Response to Comments (Statement of Basis)

N/A